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Attorneys for ROE CL Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

*Jane Roe CL 12 v. Uber Technologies,
 Inc., et al., No. 3:24-cv-04673-CRB*

*Jane Roe CL 21 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-05525-CRB*

*Jane Roe CL 30 v. Uber Technologies,
 Inc., et al., No. 3:24-cv-05591-CRB*

*Jane Roe CL 35 v. Uber Technologies,
 Inc., et al., No. 3:24-cv-05706-CRB*

*Jane Roe CL 44 v. Uber Technologies,
 Inc., et al., No. 3:24-cv-05744-CRB*

*Jane Roe CL 55 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-05835-CRB*

*Jane Roe CL 73 v. Uber Technologies,
 Inc., et al., No 3:24-cv-7030-CRB*

*Jane Roe CL 90 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-09201-CRB*

*Jane Roe CL 94 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-09550-CRB*

**ATTORNEY JENNIFER S. DOMER'S
 DECLARATION IN SUPPORT OF
 OPPOSITION TO DEFENDANTS'
 MOTION TO DISMISS CASES FOR
 FAILURE TO COMPLY WITH COURT
 ORDER**

Date: October 3, 2025
 Time: 10:00 a.m.
 Courtroom: 6 – 17th Floor

1 *Jane Roe CL 96 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-00463-CRB

2 *Jane Roe CL 99 v. Uber Technologies, Inc., et*
 3 *al., No. 3:25-cv-00855-CRB*

4 *Jane Roe CL 129 v. Uber Technologies, Inc.,*
et al., No. 3:25-cv-02498-CRB

5 *Jane Roe CL 132 v. Uber Technologies, Inc.,*
 6 *et al., No. 3:25-cv-02744-CRB*

7 *Jane Roe CL 143 v. Uber Technologies, Inc.,*
et al., No. 3:25-cv-03260-CRB

8 *Jane Roe CL 145 v. Uber Technologies, Inc.,*
 9 *et al., No. 3:25-cv-03262-CRB*

10 *Jane Roe CL 153 v. Uber Technologies, Inc.,*
 11 *et al., No. 3:25-cv-03818-CRB*

12 I, Jennifer S. Domer, declare as follows:

13 1. I am an attorney at Cutter Law P.C. admitted to practice before the courts of the
 14 State of California. I am a Partner at Cutter Law, P.C., and am one of the counsels of record for
 15 all filed Jane Roe CL claimants. I have personal knowledge of the matters set forth herein, and if
 16 called to testify, I would testify competently as to the information below.

17 2. This declaration is made in support of the Opposition to Defendants' Motion to
 18 Dismiss.

19 3. Counsel's firm has made extensive efforts to reach clients listed as Exhibit A,
 20 subject to Defendants' Motion to Dismiss.

21 4. Those efforts include extensive phone calls, text messages, emails, physical
 22 mailings to last known address, and additional address searches in databases. Counsel has also
 23 employed a private investigator to help locate these individuals. Through the database searches
 24 and private investigators, Counsel also attempted to reach potential relatives in an effort to reach
 25 the Plaintiffs.

26 5. Counsel produced the PFS for Jane Roe CL 12 on September 27, 2024, and cured
 27 the deficiency on September 5, 2025.

28 6. Counsel produced the PFS for Jane Roe CL 30 on January 10, 2025, and cured

1 the deficiency on September 5, 2025.

2 7. Counsel produced the PFS for Jane Roe CL 35 on January 7, 2025, and cured the
3 deficiency on September 5, 2025.

4 8. Counsel produced the PFS for Jane Roe CL 55 on December 30, 2024, and cured
5 the deficiency on September 5, 2025.

6 9. Counsel produced the PFS for Jane Roe CL 90 on June 3, 2025, and cured non-
7 material deficiencies on September 5, 2025.

8 10. Counsel emailed Defendants regarding excluding Jane Roe CL 90 from inclusion
9 on their Motion to Dismiss as she has not been treated by any doctors that would require her to
10 complete a HIPAA release.

11 11. Counsel received a response from Defendants on September 5, 2025, where it
12 was agreed they would withdraw Plaintiff from the Motion to Dismiss.

13 12. Counsel produced the PFS for Jane Roe CL 94 on January 30, 2025, and cured
14 the deficiency on September 5, 2025.

15 13. Counsel produced the PFS for Jane Roe CL 129 on June 4, 2025, and cured the
16 deficiency on September 5, 2025.

17 14. Counsel produced the PFS for Jane Roe CL 145 on July 3, 2025, and cured the
18 deficiency on September 5, 2025.

19 I declare under penalty of perjury that the foregoing is true and correct, and that this
20 declaration was executed on September 5, 2025, in Sacramento, California.

21
22 Dated: September 5, 2025

CUTTER LAW P.C.

23
24 By: /s/ Jennifer S. Domer

25 Jennifer S. Domer

26 *Attorney for Jane Roe CL Plaintiffs*
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